

Tijuana River National Estuarine Research Reserve

"A Wetland of International Importance" *International Ramsar Convention, 2005*



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Re: Draft Sea-Level Rise Policy Guidance- Public Comments

Thank you for the opportunity to comment on this document. We would like to make the following observations and suggestions, some of which are based on our experience with a climate change planning exercise in the Tijuana River Valley (CURRV – Climate Understanding and Resilience in the River Valley):

Strengths of the document

- We commend the Commission for highlighting natural resources, public access, and cultural resources. Often, the impacts of sea level rise are focused on development and infrastructure, forgetting other important resources.
- The document did an excellent job of highlighting regional coordination, which is particularly important when considering ecosystems that don't follow jurisdictional boundaries.
- The document was easy to follow as figures succinctly summarized the planning process. Also, it was nice to see the differences between broader LCP program planning and specific project sites highlighted, offering insight into how to downscale sea level rise planning to specific place-based tasks. The document is nicely organized, allowing for easy reference by busy local officials in locating the sections most applicable to their work without having to read hundreds of pages.

Recommendations

- Regional coordination is encouraged throughout the document, but please also encourage regional consistency to the extent possible. For instance, the range of sea level rise for 2100 is very large (i.e., 16.56 inches to 65.76 inches). If each regional agency chooses a different low, medium, and high scenario to plan within this range, it makes regional coordination more difficult. If agencies can agree on planning to the same or similar scenarios, then collaboration among agencies will be less cumbersome.
- Regional collaboration among different levels of government (i.e., local, state, federal) was explicitly encouraged throughout the document, but it would be nice to see collaboration among broader regional partners and land use managers (i.e., NGOs, Foundations) encouraged as well. It is important to be specific about this, since in many of these local jurisdictions non-government partners play a direct role in land management and/or the decision-making process.
- Although admittedly complex, we would like to see the guidance document encourage sea level rise planning and modeling be integrated with fluvial and watershed planning and modeling. Many regions are at risk from both sea level rise and riverine flooding (i.e., Tijuana

River Valley) and how those two interact will have broad, sweeping consequences for how those regions adapt to sea level rise and other coastal hazards.

- Encouraging agencies to integrate sea level rise adaptation and planning into their existing policies, plans, and practices will help to bring climate change into focus more effectively. This document is an excellent opportunity to encourage agencies to move forward in spite of lack of capacity (e.g. technical resources, staff time), as well as offer agencies suggestions on how to prepare for sea level rise within existing frameworks and with limited resources.
- It is important to make the connection between adaptation and hazard mitigation. There are theoretical and practical differences between the two, but in many regions the two fields are being integrated. In addition, local governments are intricately familiar with hazard mitigation, and there is funding out there for this. This suggests that for some entities the prospect of linking sea level rise adaptation to a well-recognized and funded field is central to helping communities understand the importance of sea level rise to their health and safety. Perhaps an excerpt outlining the similarities (i.e., linkages) and differences between the two areas would be useful in helping people orient themselves within the larger adaptation versus mitigation discussion.
- The guidance document does an excellent job of defining terms for its intended users, but we would like to point out a couple of specific terms that have caused stakeholder confusion within our local process here in the Tijuana River Valley (CURRV). (1) What is the difference between vulnerability and risk? Can we just assess vulnerability or should we assess both? (2) How does the commission define scenarios? Scenario planning is widely used to prepare for climate change but scenarios are defined differently by many agencies.
- In Appendix D, a multitude of resources are compiled and presented to readers. Perhaps we might suggest organizing them based on what step in the planning process they are most useful. Agencies embarking on sea level rise planning are going to take it one step at a time, and if they feel overwhelmed with too many resources from the beginning it may stall the process. By providing audiences with resources that correlate with the Commission's specific planning process steps, the document will help to focus agencies in on what resources are most important to their process and at what stages of planning.

Thank you for considering these comments and we will be happy to discuss this with you further.

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